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March 6, 2008

Honorable Harold Baer  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: United States v. Hussein Ali Nasser et al.  
Docket No. 07-CR-1147 (HB)

Dear Judge Baer:

I represent Hassan Chahine, one of the defendants in the above entitled case. On December 27, 2007 the first status conference was held before the Court. On that date Your Honor ordered the Government to complete discovery by February 8, 2008. Further, Your Honor requested all motions to be briefed by March 14, 2008 with oral arguments set for March 17, 2008 at 10:30 am.

On February 7, 2008, the Government sent out discovery packets to all Defense Counsel. The discovery, copies of which Defense Counsel had to order from RedRose Document Solutions, contains 30 wiretap CDs as well as 10,809 pages of various documents relating to this case.

Given the voluminous amount of discovery in this case, I as well as all other Defense Counsel are requesting an additional 6 weeks to review the discovery and to submit any motions. I have discussed this application with the attorney for the government, AUSA Jonathan B. New, and he advises me that the government would have no objection to my request.

Thank you for your consideration in this matter.

Respectfully submitted,

S/Jonathan Kaye

cc. Via ECF AUSA Jonathan New  
Martin L. Schmuckler, Esq.  
Joel S. Cohen, Esq.  
David Perlmutter, Esq.  
Paul Lieber, Esq.